

## REMARKS

### Claim Objections

The Examiner objected to the word “or” in line 1 of each one of claims 1 through 12. The term has been deleted. Applicant, accordingly, respectfully requests withdrawal of the objections to claims 1-2.

### 35 U.S.C. § 102 Rejections

The Examiner has rejected claims 1-2, 4-5, and 10-15 under 35 U.S.C. § 102(e) as being anticipated by Bae. Applicant submits that the claims, as amended, are not anticipated by Bae.

Bae discloses a first metal layer pattern 200a and a first metal compound layer pattern 202a with a step in the layer 202a. Bae does not disclose a third set of alternating dielectric layers and layers of metal lines on the second set, the third set having a third guard ring trench therein, above the second guard ring trench and having a third width which is wider than the second width. Neither does Bae disclose a third guard ring layer formed on surfaces of the guard ring trench.

Claim 1 now specifically includes the limitation of a third set of alternating dielectric layers and layers of metal lines on the second set, the third set having a third guard ring trench therein, above the second guard ring trench, and having a third width which is wider than the second width. Claim 1 also includes the

limitation of a third guard ring layer formed on surfaces of the third guard ring trench.

Claim 1 thus includes at least one limitation that is not suggested by Bae. Claims 2 and 4-5 depend from claim 1, and should be allowable for at least the same reasons as claim 1. Limitations have been added to claim 10 that are similar to the limitations added to claim 1. Claims 10-12 should thus be allowable for at least the same reasons as claim 1. Similar limitations have also been added to method claim 13. Claims 13-15 should thus be allowable for at least the same reasons as claim 1.

Applicant, accordingly, respectfully requests withdrawal of the rejections of claims 1-2, 4-5, and 10-15 under 35 U.S.C. § 102(e) as being anticipated by Bae.

#### New Claims

The Examiner, under the heading "Claim Objections," objected to the term "or" in claims 1-12. New claims 16-25 have been added that correspond to claims 1-2, 4-5, and 7-12, except that a microelectronic die is claimed instead of a combination wafer. Applicant submits that the claims for a microelectronic die are allowable for the same reasons the claims for a combination wafer are allowable.

Applicant respectfully submits that the present application is in condition for allowance. If the Examiner believes a telephone conference would expedite

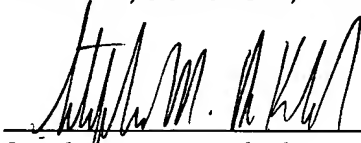
or assist in the allowance of the present application, the Examiner is invited to call Stephen M. De Klerk at (408) 720-8300.

Please charge any shortages and credit any overages to Deposit Account No. 02-2666. Any necessary extension of time for response not already requested is hereby requested. Please charge any corresponding fee to Deposit Account No. 02-2666.

Respectfully submitted,

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